

EXHIBIT 80

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

RE: NATIONAL) MDL No. 2804
SCRIPTION OPIATE)
IGATION,) Case No.
) 1:17-MD-2804
)
S DOCUMENT RELATES TO) Hon. Dan A.
CASES) Polster
)

Friday, January 11, 2019

HIGHLY CONFIDENTIAL - SUBJECT TO FURTHER
CONFIDENTIALITY REVIEW

15 Videotaped Deposition of DEBBIE HODGES, held
at 4206 South J.B. Hunt Drive, Rogers,
16 Arkansas, commencing at 8:15 a.m., on the
above date, before Debra A. Dibble, Certified
17 Court Reporter, Registered Diplomate
Reporter, Certified Realtime Captioner,
18 Certified Realtime Reporter and Notary
Public.

GOLKOW LITIGATION SERVICES
877.370.3377 | fax 917.591.5672
deps@golkow.com

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1	A. I don't know.	1 dropped in for a bit.
2	Q. Is it the Patrick that's	2 Q. And do you know Jennifer's last
3	sitting at counsel table?	3 name?
4	A. It is. It is.	4 A. I don't.
5	Q. Thank you.	5 Q. Is Jennifer here today?
6	Anyone else other than	6 A. Correct, she is.
7	yourself, Tina, or Patrick attend that	7 Q. And Jennifer is seated at the
8	meeting?	8 end of the table?
9	A. There were a couple of Walmart	9 A. She is.
10	attorneys that came in and out, but ...	10 Q. And you said there was one
11	And I couldn't tell you who	11 other Walmart attorney that attended?
12	their names were.	12 A. Mm-hmm. And I believe it was
13	Q. How are you certain that they	13 Rob. But I don't know Rob's last name.
14	were Walmart attorneys if you did not know	14 Q. I'll just take you to the third
15	their names?	15 and final session.
16	A. They identified themselves, and	16 Well, strike that.
17	they gave their names. I just can't -- I	17 How long was the second
18	don't recall their names.	18 session?
19	MS. TABACCHI: I can represent	19 A. It was four hours,
20	to you, Michael, that there's been	20 approximately.
21	nobody other than counsel in any of	21 Q. And where did that occur?
22	these meetings.	22 A. It occurred in the -- a
23	MR. INNES: Thank you, Tina.	23 conference room.
24	Q. (BY MR. INNES) Approximately	24 Q. At Walmart?
25	how long was that first session?	25 A. Correct.
	Page 11	Page 13
1	A. It was a few hours.	1 Q. And what's -- which -- what's
2	Q. During that session did you	2 Walmart's address?
3	review any documents?	3 A. It's on Walton Boulevard.
4	A. No, I don't believe I did.	4 Q. The location on Walton
5	Q. Did you review any deposition	5 Boulevard?
6	testimony in this case?	6 A. Correct.
7	A. No.	7 Q. And the final session, the one
8	Q. Did you review any court	8 the day before yesterday?
9	documents?	9 A. Same location.
10	A. I don't -- no.	10 Q. And what was the date of that
11	Q. Do you not recall or do you	11 session?
12	just not know?	12 MS. TABACCHI: I'm sorry, just
13	A. No, I said no.	13 to clarify, the final session was
14	MS. TABACCHI: I think that was	14 yesterday, not the day before
15	no. N-O.	15 yesterday.
16	THE WITNESS: Right, it was.	16 MR. INNES: I'm sorry.
17	It was no.	17 Q. (BY MR. INNES) What was the
18	Q. (BY MR. INNES) When was the	18 date of the final session?
19	date of the second session that you met with	19 A. It was yesterday.
20	counsel?	20 Q. Yesterday?
21	A. It was Wednesday of this week.	21 A. Yes.
22	Q. Okay. And who attended that	22 Q. And for how many hours did you
23	session?	23 meet?
24	A. Tina, Patrick, Jennifer, and	24 A. Approximately six to seven.
25	there was another Walmart attorney that	25 Q. And who was present at that

1 meeting? 2 A. Tina, Patrick, Jennifer. 3 Q. The same Jennifer that's seated 4 at the end of the table? 5 A. Yes. 6 Q. Anyone else? 7 A. No. 8 Q. In the second session, did you 9 review any documents? 10 A. Yes. 11 Q. Did you review any deposition 12 testimony? 13 A. No. 14 Q. Did you review any court 15 documents? 16 A. No. 17 Q. In the third session, did you 18 review any documents? 19 A. Yes. 20 Q. Did you review any testimony? 21 A. Did I what? 22 Q. Did you review any deposition 23 testimony? 24 A. No. 25 Q. Did you review any court	Page 14 1 complaint in this case? 2 A. I don't have any knowledge, 3 other than communication with counsel. 4 Q. Do you agree that the 5 United States is currently in an opioid 6 crisis? 7 A. Yes. 8 Q. What's the basis for your 9 agreement with that statement? 10 A. I'm aware of the -- what media 11 publishes. 12 Q. And what media sources 13 specifically? 14 A. I read newspapers. 15 Q. Which newspapers do you read? 16 A. I read the Benton County 17 Gazette, or the Gazette. Democrat-Gazette, I 18 think it's called. Occasionally I read the 19 Wall Street Journal. I read an investment 20 newspaper. 21 Q. What investment newspaper is 22 that? 23 A. I think it's called IBD. 24 Q. Are you aware that between 2000 25 and -- year 2000 and year 2014, unintentional
1 documents? 2 A. No. 3 Q. Have you read the complaint 4 that was filed in this case? 5 A. No. 6 Q. Are you familiar with the 7 allegations in the complaint as they relate 8 to Walmart? 9 MS. TABACCHI: Object to the 10 form. I'm also going to caution the 11 witness not to reveal the substance of 12 any communications with counsel. 13 If you can answer the question 14 without revealing the substance of 15 communications with counsel, you may. 16 Otherwise, I will instruct you not to 17 answer the question if your 18 understanding comes from 19 communications with counsel, to the 20 extent you had one. 21 THE WITNESS: Can you repeat 22 the question? 23 Q. (BY MR. INNES) Other than your 24 conversations with counsel, what is your 25 knowledge, if any, of the allegations in the	Page 15 1 drug overdose deaths in the U.S. increased by 2 137 percent? 3 A. No. 4 Q. Can you hear me? 5 MS. TABACCHI: I'm having a 6 little trouble hearing you. 7 MR. INNES: I'll try to speak 8 up. 9 THE WITNESS: When he bends his 10 head down. So just -- I have a 11 hearing disability, and so I can watch 12 your lips, and I'll be able to pick up 13 on it. I have hearing aids. But when 14 you bend your head down, it's very 15 difficult for me to see your lips. 16 MR. INNES: Sure. Thank you 17 very much for pointing that out. And 18 I'll do my best to speak with my face 19 up so you can see my lips moving. 20 Q. (BY MR. INNES) So maybe if I 21 can, just do a little rearranging here. 22 So I'll reread the -- 23 A. Sure. 24 Q. -- re-ask the question. 25 Between the year 2000 and 2014,

<p style="text-align: right;">Page 18</p> <p>1 are you aware that unintentional drug 2 overdose deaths in the U.S. increased 3 137 percent? 4 A. I was not aware of that. 5 Q. Between -- were you aware that 6 between the year 2000 and 2014, there were 7 500,000 deaths due to prescription overdoses? 8 A. No, I was not aware of that. 9 Q. Were you aware that in 2015, 10 over 47,000 drug-related -- there were over 11 47,000 drug-related deaths? 12 A. No. I was not aware. 13 Q. Do you recall attending a DEA 14 Distributor Conference in Indianapolis, 15 Indiana on May 10th or 11th of 2016? 16 A. No. I did not attend that 17 conference.</p> <p>[REDACTED]</p> <p>22 Q. In preparation for today's 23 testimony, have you looked in your own 24 personal paper files for documents that might 25 be relevant to your testimony today?</p>	<p style="text-align: right;">Page 20</p> <p>1 My question is slightly 2 different. 3 I'm wondering if you attempted 4 to find such documents. 5 A. No. 6 Q. Did you -- prior to today, in 7 preparation for your testimony, did you speak 8 with any colleagues about your testimony? 9 A. No. 10 Q. Have you spoken with any family 11 members about the testimony you were about to 12 give? 13 A. No. 14 Q. Have you spoken with any 15 non-Walmart employees regarding the testimony 16 that you are about to give today? 17 A. No. 18 Q. Ms. Hodges, where did you 19 attend college? 20 A. Southwest Missouri State 21 University. 22 Q. And when did you graduate from 23 Southwest Missouri University? 24 MS. TABACCHI: Object to the 25 form.</p>
<p style="text-align: right;">Page 19</p> <p>1 A. I don't have any paper files. 2 Q. Have you looked in any 3 electronic files prior to today to help 4 prepare for your testimony? 5 MS. TABACCHI: Object to the 6 form. 7 THE WITNESS: I have looked at 8 documents that we reviewed over the 9 past couple of days. 10 Q. (BY MR. INNES) The documents 11 that you reviewed in preparation for today, 12 the only documents you reviewed, were those 13 with counsel? 14 A. Correct. 15 Q. You did not review any 16 documents outside of the presence of counsel? 17 A. Correct. 18 Q. Did you endeavor to look in 19 your own electronic or paper files for 20 documents that may help refresh your 21 recollections of any events that might be 22 relevant for today? 23 A. I did not look at any documents 24 in my files, either paper or electronic. 25 Q. Thank you.</p>	<p style="text-align: right;">Page 21</p> <p>1 Q. (BY MR. INNES) Strike that. 2 When did you graduate from Southwest Missouri 3 State University? 4 A. 1985. 5 Q. Okay. Did you attend any 6 graduate programs after your graduation from 7 college? 8 A. I did. 9 Q. And what school was that? 10 A. University of Missouri 11 Columbia. 12 Q. And what degree did you obtain 13 from University of Missouri Columbia? 14 A. A JD. 15 Q. And what year was that? 16 A. 1988. 17 Q. You graduated in 1988? 18 A. Correct. 19 Q. Did you sit for a bar exam 20 after your graduation? 21 A. I did. 22 Q. In what state did you sit for 23 the bar exam? 24 A. Missouri. 25 Q. And what year were you admitted</p>

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22 Q. Okay. And at this point you're
23 aware that the country is in an opioid
24 crisis. That is correct; right?

25 A. Yes.

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[REDACTED]

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[REDACTED]

9 Q. And during this time period,
10 you're aware of the opioid crisis; is that
11 right?
12 A. Correct.
13 Q. And did you ever inquire --
14 strike that.

[REDACTED]

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